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July 7, 2025

VIA ELECTRONIC FILING

The Honorable John P. Cronan
United States District Court
Southern District of New York
500 Pearl Street, Room 1320
New York, NY 10007

Re: *Deutsche Bank AG, London Branch v. Finepoint Capital LP, et al.*,
Case No. 1:24-cv-04567-JPC

Dear Judge Cronan:

Plaintiff Deutsche Bank AG, London Branch (“Deutsche Bank”), together with Defendants Finepoint Capital LP, Warbler Run I, LLC, and Warbler Run II, LLC (collectively “Defendants”), respectfully and jointly request that the telephonic conference scheduled for 3:00 p.m. on July 8, 2025, be adjourned for at least one week to allow the parties further time to confer concerning a question Your Honor identified for discussion during the conference as to the Court’s subject-matter jurisdiction over this dispute. *See* ECF No. 33.

The parties apologize that this request is being made less than 24 hours before the scheduled appearance, but respectfully submit there are compelling circumstances that prevented this request from being filed sooner. This is the first such request for adjournment of this conference.

Today, Defendants’ counsel informed Deutsche Bank that, after the Court entered its Order setting the conference (ECF No. 33), they became aware for the first time of information that leads Defendants to believe there may not be complete diversity of citizenship between the parties. In response, Deutsche Bank requested—and Defendants agreed to provide—copies of relevant documents that bear on this issue. We would appreciate the opportunity to review those documents carefully and confer with our client. The parties respectfully request that tomorrow’s hearing be adjourned by at least one week to allow my firm to review those documents carefully, confer with our client, and attempt to resolve collaboratively with Defendants in advance of a rescheduled conference any uncertainties about the Court’s jurisdiction.

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All parties are prepared to proceed tomorrow if the Court prefers to proceed with the conference as scheduled. The parties thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Michael S. Kraut

Michael S. Kraut

cc: All counsel of Record

The instant request is granted. The conference currently set for July 8, 2025, is rescheduled to July 15, 2025, at 3:30 p.m.

SO ORDERED.
Date: July 7, 2025
New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN
United States District Judge